

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
Charlottesville Division

ELIZABETH SINES, SETH WISPELWEY,  
MARISSA BLAIR, TYLER MAGILL, APRIL  
MUNIZ, HANNAH PEARCE, MARCUS  
MARTIN, NATALIE ROMERO, CHELSEA  
ALVARADO, and JOHN DOE

Plaintiffs,

v.

Civil Action No.: 3:17CV00072

JASON KESSLER, RICHARD SPENCER,  
CHRISTOPHER CANTWELL, JAMES ALEX  
FIELDS, JR., VANGUARD AMERICA,  
ANDREW ANGLIN, MOONBASE  
HOLDINGS, LLC, ROBERT “AZZMADOR”  
RAY, NATHAN DAMIGO, ELLIOTT  
KLINE a/k/a ELI MOSELEY, IDENTITY  
EVROPA, MATTHEW HEIMBACH, MATTHEW  
PARROTT a/k/a DAVID MATTHEW PARROTT,  
TRADITIONALIST WORKER PARTY,  
MICHAEL HILL, MICHAEL TUBBS, LEAGUE  
OF THE SOUTH, JEFF SCHOEP, NATIONAL  
SOCIALIST MOVEMENT, NATIONALIST  
FRONT, AUGUSTUS SOL INVICTUS,  
FRATERNAL ORDER OF THE ALT-KNIGHTS,  
MICHAEL “ENOCHE” PEINOVICH, LOYAL  
WHITE KNIGHTS OF THE KU KLUX KLAN,  
and EAST COAST KNIGHTS OF THE KU KLUX  
KLAN a/k/a EAST COAST KNIGHTS OF THE  
TRUE INVISIBLE EMPIRE,

Defendants.

**FIELDS’ MOTION FOR REMITTITUR**

COMES NOW JAMES ALEX FIELDS, by and through Counsel, hereby moves this  
Court for Remittitur as authorized by Fed. R. Civ. P. 59(a) and (e) to reduce the award of  
punitive damages to an amount that is constitutional and does not exceed the punitive damages

cap of \$350,000 under Virginia law, for the reasons stated in his accompanying memorandum in support thereof.

Respectfully submitted,

JAMES ALEX FIELDS, JR.

By Counsel

/s/ David L. Campbell, Esquire

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CERTIFICATE OF SERVICE

I hereby certify that on 9<sup>th</sup> day of March, 2022, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send Notification of Electronic Filing (NEF) to the following:

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I further certify that on March 9, 2022, I also served the following non-ECF participants, via electronic mail as follows:

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